

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

NADIA BIGLARI,

Plaintiff,

V.

UNIVERSITY OF NEBRASKA LINCOLN,
by and through its Board of Regents; ERIC
DODDS, in his official and individual
capacity; CHRISTOPHER MCCUNE, in his
official and individual capacity,

Defendants.

Case No. 4:22-CV-3268

**UNOPPOSED MOTION FOR
EXTENSION OF TIME TO
FILE RESPONSIVE
PLEADING OR MOTION**

COMES NOW Defendant Christopher McCune, in his individual capacity, and pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), moves the Court for an order extending McCune's time to respond to plaintiff's amended complaint in this action from April 12, 2023 to May 3, 2023. In support thereof, McCune states the following:

1. McCune received the summons and amended complaint on or about February 18, 2023.
2. McCune was granted an extension to April 12, 2023 (Filing No. 19).
3. Counsel for McCune needs additional time to prepare a response to the amended complaint which spans 32 pages, 127 paragraphs.
4. Good cause exists for the extension requested herein, as McCune requires additional time to investigate the facts of this case and prepare a response to plaintiff's amended complaint.
5. Plaintiff's counsel has indicated to the undersigned that he does not oppose this motion.

6. Counsel for Defendants University of Nebraska Lincoln and Eric Dodds has indicated to the undersigned that she does not oppose this motion.

WHEREFORE Defendant McCune requests the Court enter an order granting an extension of time to respond to plaintiff's amended complaint, such that the deadline to respond shall be May 3, 2023.

DATED this 4th day of April, 2023.

CHRISTOPHER MCCUNE, in his
individual capacity, Defendant,

By: s/ Jason W. Grams
Jason W. Grams, #24596
LAMSON, DUGAN and MURRAY, LLP
10306 Regency Parkway Drive
Omaha, NE 68114
Tele: (402) 397-7300 | Fax: (402) 397-7824
jgrams@ldmlaw.com
ATTORNEY FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2023, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all parties.

s/ Jason W. Grams
Jason W. Grams